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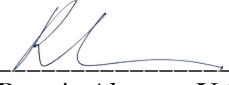
April 12, 2020

Sent Via ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
April 12, 2021

Re: USA v. Edoel Guerrero, et al. 19 Cr. 621

Dear Judge Abrams:

We represent Edoel Guerrero in the above-captioned matter. Mr. Guerrero is currently scheduled to surrender to Bureau of Prisons (BOP) on April 21, 2021, but is requesting an extension of time of two months to surrender. Mr. Guerrero recently learned that his girlfriend is pregnant with his child: he would like to attend the initial doctors' appointments and sonograms. The first month is critical for a pregnant woman and especially a woman with an auto-immune disorder. Sadly, he will miss the birth of his first child while he's incarcerated. The Government consents to this request for an extension and Pre-Trial Services takes no position.

Additionally, Mr. Guerrero has not been vaccinated as he does not qualify at this time. He hopes to be vaccinated before serving his sentence. As you are aware, the Corona virus continues to spread rapidly throughout the prisons: the BOP does not always follow CDC protocols and inmates do not always receive proper medical attention when afflicted with this deadly disease. For example, approximately two months ago, an inmate suffered for weeks at the MDC and ultimately died from lack of proper medical attention.

Lastly, Edoel is working very hard to save money to support his pregnant girlfriend and his disabled mother while he is incarcerated. He is taking full financial responsibility and is making preparations to provide for his family while he serves his sentence.



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If you have any questions or concerns, please do not hesitate to contact me. Thank you for your time and consideration.

Very truly yours,

/S/
Jacqueline E. Cistaro
David K. Bertan

cc: Assistant United States Attorney Alexandra Rothman (*via electronic mail and ECF*)
Pre-Trial Services Officer Erin Cunningham (*via electronic mail and ECF*)